



PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

State of New Jersey
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September 23, 2019

Honorable Joseph A. Dickson, U.S.M.J.
United States District Court
Martin Luther King Courthouse
50 Walnut St.
Newark, NJ 07101

Re: Castaldo v. State of New Jersey, et al.
Civil Action No. 18-cv-14249 ES-JAD

Dear Judge Dickson:

This Office represents Defendants Governor Philip D. Murphy and NJDOC Commissioner Marcus O. Hicks. The Defense of this matter will be handled by my colleague, Chancell Brach, who has recently joined the ranks at the Division of Law. DAG Branch is in the process of obtaining admission to the District of New Jersey, and as such cannot yet enter her appearance and advocate on behalf of the Defendants. I therefore request a 45-day extension of time for the Defendants to respond to Plaintiff's most recent request for injunctive relief [ECF No. 24], to allow for sufficient time for DAG Branch to be admitted and respond to the pending motion.

I further request that the Defense's responsive pleading deadline be suspended until such time as Plaintiff's Motion for Leave to File an Amended Complaint [ECF No. 20] has been decided. This will serve the interests of justice and judicial efficiency by giving the parties certainty as to what pleading is operative in this case.

The Defense has not obtained Plaintiff's consent, as he is incarcerated.



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Thank you for your consideration.

Respectfully submitted,

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Kai W. Marshall-Otto
Kai W. Marshall-Otto
Deputy Attorney General

cc: Frank Castaldo (via regular mail)